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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 US RIGHT TO KNOW,

CASE NO. 23-cv-2936-TSH

13 Plaintiff,

14 v.

15 UNITED STATES DEFENSE
16 INTELLIGENCE AGENCY,

17 Defendant.

**STIPULATION AND [PROPOSED] ORDER RE
CASE MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES**

18 Plaintiff, US Right to Know (“Plaintiff” or “USR TK”) and Defendant, the United States Defense
19 Intelligence Agency, submit this stipulation pursuant to Local Civil Rule 6-2 to continue the initial case
20 management conference and associated deadlines from September 14, 2023 to October 26, 2023 at 10:00
21 a.m.

STIPULATION

22 WHEREAS, Plaintiff, US Right to Know filed a Freedom of Information Act (“FOIA”) complaint
23 on June 14, 2023. ECF No. 1.

24 WHEREAS, the Defendant, United States Defense Intelligence Agency (“DIA” or “the Agency”),
25 provided a final response to Plaintiff’s FOIA request on August 22, 2023 and an amended final response
26 on August 23, 2023. On August 23, 2023, the Agency filed a response to the Complaint and a corrected
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28 STIPULATION AND [PROPOSED] ORDER RE CASE MANAGEMENT CONFERENCE AND ASSOCIATED
DEADLINES

NO. 23-CV-2936 TSH

1 answer on August 24, 2023. ECF Nos. 23, 24.

2 WHEREAS, the parties are working together cooperatively in this case and Plaintiff informed
3 Defendant on August 29, 2023 that it has not had sufficient time to review the Agency's final response. As
4 such, this continuance will provide Plaintiff with the additional time necessary to review the Agency's
5 final response and to determine whether there are any disputes remaining. If so, this continuance will also
6 provide the parties with the necessary time to discuss any remaining issues without the need for judicial
7 intervention.

8 WHEREAS, the requested continuance is not expected to have any adverse impact on the schedule
9 for the case and serves the judicial economy by allowing the parties additional time to attempt to resolve
10 this matter without the need for further judicial intervention,

11 AS SUCH, it is hereby stipulate by and between the parties, through the undersigned counsel that
12 the initial case management conference, along with the associated deadlines is continued from September
13 14, 2023 to October 26, 2023 at 10:00 a.m.

14 DATED: August 30, 2023

ISMAIL J. RAMSEY
United States Attorney

/s/ Valerie E. Smith*
VALERIE E. SMITH
Assistant United States Attorney

Attorneys for the Federal Defendant

/s/ Daniel C. Snyder
DANIEL C. SNYDER

/s/ Lily Anne Rivo
LILY ANNE RIVO
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Attorneys for Plaintiff

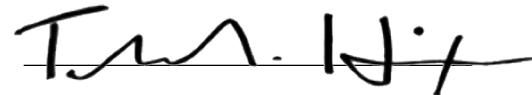
24 *In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury
25 that all signatories have concurred in the filing of this document.

1 **[PROPOSED] ORDER**

2 Pursuant to the stipulation of the parties and good cause appearing, IT IS HEREBY ORDERED
3 that the case management conference currently scheduled for September 14, 2023 at 10:00 a.m. is
4 continued to 10/26/23. A case management statement shall be filed seven days before the case
5 management conference.

6 IT IS SO ORDERED.

7 Date: August 31, 2023



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THE HON. THOMAS S. HIXSON
UNITED STATES MAGISTRATE JUDGE